



Illinois Environmental Protection Agency - 2200 Churchill Road, Springfield, IL 62766

217/782-6762

EPA Region 5 Records Ctr.



362309

Refer to: 11911501 -- Madison County  
Wood River/AMOCO Main Office and Wastewater Treating Plant  
ILD 006272629

March 23, 1984

AMOCO Oil Company  
200 East Randolph Drive  
P.O. Drive 6110-A  
Chicago, IL 60680

Dear Mr. Huddle:

This letter is in response to your closure plan for the above referenced facility submitted to the Agency on February 28, 1984 and received on March 2, 1984.

Because of deficiencies in your closure plan which are enumerated hereafter the Agency is requesting that you supplement the information originally submitted with your closure plan within thirty (30) days of receipt of this letter. All references are to Subtitle G, 35 Ill Admin. Code, Part 725.

As the Part A for the above referenced facility includes all the property described by the facility drawing on page 5 of the application, all hazardous waste management operations that occurred on this property need to be addressed in the closure plan. From the information available, it appears that this would include at least the following:

1. DAF float storage tank T-202
2. DAF float belt filter feed tank T-1001
3. The belt filters
4. Container storage area(s)
5. Any spills or leaks that occurred on the property.

Documentation submitted to date is incomplete and does not satisfy the requirements of 725.211. The following deficiencies need to be addressed:

1. An estimate of the maximum inventory of wastes in storage and treatment at any time during the life of the facility [725.212(a)(2)].

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OFFICE OF  
J. G. HUDDLE

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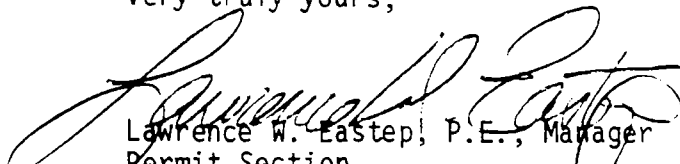


Page 2

2. A description of the steps needed to decontaminate facility equipment during closure [725.212(a)(3)] must include all tanks, pumps and piping; the belt filters; and containment structures [725.214] [725.297].
3. An estimate of the expected year of closure and a schedule for final closure. [725.212(a)(4)].
4. A description of how the known and probable past disposal areas will be closed in such a way to comply with [725.211(b)].
5. Please provide an outline of the closure cost estimate that indicates the costs of the individual closure activities and how these costs are derived. [725.242(a)]

The Agency does not deem this request for supplemental information to be a disapproval for administrative purposes under Subtitle G, Section 725.212(d). However, a failure to submit the information within 30 days of this letter may render your plan subject to disapproval.

Very truly yours,

  
Lawrence W. Eastep, P.E., Manager  
Permit Section  
Division of Land Pollution Control

LWE:WRW/maw/0644d/4-5

cc: Southern Region  
Division File  
Compliance Assurance

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**Amoco Oil Company**

200 East Randolph Drive  
Post Office Box 6110-A  
Chicago, Illinois 60680

February 28, 1984

Certified No. 454 431 169

Return Receipt Requested

Mr. Larry Eastep, P.E.  
Manager, Permit Section  
Division of Land Pollution Control  
Environmental Protection Agency  
2200 Churchill Road  
Springfield, Illinois 62706

Dear Mr. Eastep:

RCRA Closure of Facilities at Amoco's Wood River Wastewater Treating Plant--EPA ID No. ILD006272629

As you are aware, Amoco Oil Company has donated its wastewater treating plant in Wood River to the City of Wood River. Prior to the actual assumption of operation of the plant by the City, we want to clarify its status, vis a vis, the Resource Conservation and Recovery Act (RCRA). Our plant was listed on our RCRA, Part A, application because, at that time, it generated, stored, and treated dissolved air flotation (DAF) float from petroleum refining, a waste listed as hazardous by the USEPA. Since the mothballing of the refinery in 1981, the plant no longer generated DAF float from petroleum refining operations. Now that a final decision has been made not to resume petroleum refining at Wood River, removal of the plant from the RCRA system becomes appropriate and desirable. To do this, we understand that we must go through a RCRA closure, even though the plant continues to operate. Pursuant to your instructions to E. J. Sullivan in a telephone conversation on February 17, 1984, we will describe the events that occurred at the wastewater plant following suspension of petroleum refining operations, and request that you consider this letter to be our closure plan.

To aid in following the sequence of events, some background information will be helpful. The total Amoco facility in Wood River comprises three parcels of land: 1) the refinery site, 2) the main office-wastewater treating plant site, and 3) the riverfront site. Each site has interim status under RCRA and has its own ID number. Prior to October 1, 1981, Amoco Oil Company conducted all operations connected with the facility. With the exception of additive manufacturing units and ancillary operations that are owned by Amoco Chemicals Corporation, Amoco Oil Company owned all of the Wood River property.

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and equipment. Since 1981, certain segments of real estate, both improved and otherwise, have been donated or exchanged for other property.

Prior to 1977, wastewater treating facilities were located on the riverfront site and consisted of a series of aerated and non-aerated lagoons. New NPDES effluent discharge limitations that became effective on July 1, 1977, were more stringent than earlier limits and could not be complied with using existing facilities. Accordingly, construction of a new wastewater treatment facility began in 1976 and was put into operation in August, 1977. The former treatment lagoons became storm-water surge ponds. The new treatment sequence included: 1) clarification with dissolved air flotation, 2) mixed media filtration, 3) bio-oxidation with activated sludge, 4) clarification, and 5) final filtration. The plant also had an aerobic digester and belt filters for dewatering waste solids.

Until 1981, the new wastewater treatment plant served the combined petroleum refining and additive manufacturing operations. In early 1981, Amoco Oil Company announced a decision to suspend petroleum refining operations at Wood River. By June 1, 1981, all refining units had been shut down and placed in standby condition. Except for a petroleum terminaling function, operation and administration of the Wood River facility was officially turned over to Amoco Chemicals Corporation on October 1, 1981.

In November, 1980, two storage tanks, two belt presses, and two containers for dewatered solids became hazardous waste facilities because DAF float was stored and treated in this equipment. The USEPA defined DAF float from petroleum refining as a hazardous waste and identified it as K048. A copy of the Part A of the RCRA permit application that was filed in 1980 is attached as Appendix A.

The entire wastewater plant is enclosed with a chain-link fence with pedestrian and vehicle access gates. The fence also encloses an adjacent petroleum product storage tank field. Warning signs were posted to meet requirements for interim status. An operator is on duty 24 hours a day, 7 days a week.

Hazardous waste management at this site consisted of storage and treatment (dewatering) of DAF float. DAF float was generated in the inlet clarifier-dissolved air flotation unit and skimmed into and accumulated in Tank T-202. When this tank was filled, the DAF float was pumped either to the riverfront surge ponds for storage or to Tank T-1001, the belt filter feed tank. From T-1001, the DAF float, either alone or mixed with waste-activated sludge, was pumped to one of the belt filters for dewatering. Separated water recycled to the treating plant feed sump. Solids were discharged to a roll-off trailer box. When the box was filled, the dewatered solids were disposed of in a hazardous waste landfill. Most of the DAF float was impounded in the surge ponds, because its high oil content made it difficult to dewater.

Beginning June 1, 1981, with the suspension of petroleum refining operations, the DAF float, generated at the wastewater plant was no longer a hazardous waste by definition; it was hazardous only if it

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had one of the four prescribed hazardous waste characteristics. It also had a much lower oil content than it had during petroleum refining operations and became more amenable to dewatering on the belt presses. Dewatering of DAF float was continued, and the first full box of dewatered solids was sampled on August 17, 1981. The sample was taken from the surface of the solids in the box, so that it represented the last discharge from the belt press. The sample was then submitted to Environmental Analysis, Incorporated, in St. Louis, to be tested for the four hazardous waste characteristics. The analysis, a copy of which is attached as Appendix B, showed that the solids did not have any of the four characteristics of a hazardous waste. A copy of the analysis was furnished to Midwest Sanitary Service, who were requested to apply for a supplemental permit for disposal of the non-hazardous solids.

While this application was being processed, dewatered solids continued to be disposed of as a hazardous waste. Between August 20 and November 18, 1981, this amounted to a total of 10 boxes of solids. The nonhazardous DAF float was being generated at a rate of about 12,000 gallons/day, so we estimate that about 55 volumes passed through T-202 and 12 to 15 volumes through T-1001 during this same period.

After receipt of the supplemental permit classifying the dewatered solids as non-hazardous, disposal as a special waste to a nonhazardous landfill was initiated. A copy of the supplemental permit is attached as Appendix C.

Upon your acceptance of this letter as our closure plan, we will proceed to arrange for certification of closure. We estimate the cost of certification will be about \$3,000. Since this was not a disposal facility, and no hazardous waste remains on-site, no post-closure care is required.

If you have any questions or require further information, please contact E. J. Sullivan at 312/856-5858.

Yours truly,

A handwritten signature in cursive script that reads "John G. Huddle". To the right of the signature, the initials "EJS" are written in a similar cursive style.

John G. Huddle  
Director, Environmental Control  
and Planning  
Mail Code 1203

EJS/dmk

Attachments

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<div style="display: flex; justify-content: space-between;"> <div style="text-align: left;"> <b>1</b> GENERAL </div> <div style="text-align: center;"> <b>EPA</b>  GENERAL INFORMATION  Consolidated Permit Program  (Use this General Information before starting) </div> <div style="text-align: right;"> EPA ID NUMBER  <b>IL2D006272629</b> </div> </div>																																					
PLEASE PLACE LABEL IN THIS SPACE		<b>GENERAL INSTRUCTIONS</b>  If a preprinted label has been provided, affix it in this designated space. Review the information carefully. If any of it is incorrect, cross through it and enter the correct data in the appropriate fill-in area below. Also, if any of the preprinted data is absent (the area to the left of the label space lists the information that should appear), please provide it in the proper fill-in area(s) below. If the labels are complete and correct, you need not complete Items I, III, V, and VI (except VI-B which must be completed regardless). Complete all items if no label has been provided. Refer to the instructions for detailed item descriptions and for the legal authorizations under which this data is collected.																																			
<b>II. POLLUTANT CHARACTERISTICS</b>  INSTRUCTIONS: Complete A through J to determine whether you need to submit any permit application forms to the EPA. If you answer "yes" to any questions, you must submit this form and the supplemental form listed in the parenthesis following the question. Mark "X" in the box in the third column. If the supplemental form is attached. If you answer "no" to each question, you need not submit any of these forms. You may answer "no" if your activity is excluded from permit requirements; see Section D of the instructions. See also, Section D of the instructions for definitions of bold-faced terms.																																					
<table border="1" style="width:100%; border-collapse: collapse;"> <thead> <tr> <th style="text-align: left;">SPECIFIC QUESTIONS</th> <th style="text-align: center;"> YES NO  <input type="checkbox"/> <input type="checkbox"/> </th> <th style="text-align: center;"> FORM  ATTACHED </th> </tr> </thead> <tbody> <tr> <td>A. Is this facility a publicly owned treatment works which results in a discharge to waters of the U.S.? (FORM 2A)</td> <td style="text-align: center;">X</td> <td></td> </tr> <tr> <td>C. Is this a facility which currently results in discharges to waters of the U.S., other than those described in A or B above? (FORM 2C)</td> <td style="text-align: center;">X</td> <td></td> </tr> <tr> <td>E. Does or will this facility treat, store, or dispose of hazardous wastes? (FORM 3)</td> <td style="text-align: center;">X</td> <td></td> </tr> <tr> <td>G. Do you or will you inject at this facility any produced water or other fluids which are brought to the surface in connection with conventional oil or natural gas production, inject fluids used for enhanced recovery of oil or natural gas, or inject fluids for storage of liquid hydrocarbons? (FORM 4)</td> <td style="text-align: center;">X</td> <td></td> </tr> <tr> <td>I. Is this facility a proposed stationary source which is one of the 28 industrial categories listed in the instructions and which will potentially emit 100 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)</td> <td style="text-align: center;">X</td> <td></td> </tr> </tbody> </table>	SPECIFIC QUESTIONS	YES NO <input type="checkbox"/> <input type="checkbox"/>	FORM ATTACHED	A. Is this facility a publicly owned treatment works which results in a discharge to waters of the U.S.? (FORM 2A)	X		C. 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<b>III. NAME OF FACILITY</b> <div style="border: 1px solid black; padding: 2px;"> 1 SKIP AMOOD OIL MAIN OFFICE AND WATER TREAT </div>																																					
<b>IV. FACILITY CONTACT</b> <div style="display: flex; justify-content: space-between;"> <div style="width: 60%;"> A. NAME &amp; TITLE (NAME, ADDRESS, PHONE) </div> <div style="width: 35%;"> B. PHONE (AREA CODE &amp; NO.) </div> </div> <div style="border: 1px solid black; padding: 2px;"> 2 E. O. SULLIVAN CONSULT, ENV. CONTRL. 253 2249 </div>																																					
<b>V. FACILITY MAILING ADDRESS</b> <div style="display: flex; justify-content: space-between;"> <div style="width: 60%;"> A. STREET OR P.O. BOX </div> <div style="width: 35%;"> B. CITY OR TOWN </div> <div style="width: 35%;"> C. STATE D. ZIP CODE </div> </div> <div style="border: 1px solid black; padding: 2px;"> 3 304 132 </div> <div style="border: 1px solid black; padding: 2px;"> 4 WOOD RIVER </div> <div style="border: 1px solid black; padding: 2px;"> 5 IL 62095 </div>																																					
<b>VI. FACILITY LOCATION</b> <div style="display: flex; justify-content: space-between;"> <div style="width: 60%;"> A. STREET, ROUTE NO. OR OTHER SPECIFIC IDENTIFIER </div> <div style="width: 35%;"> B. COUNTY NAME </div> <div style="width: 35%;"> C. CITY OR TOWN </div> <div style="width: 35%;"> D. STATE E. ZIP CODE </div> <div style="width: 35%;"> F. COUNTY CODE </div> </div> <div style="border: 1px solid black; padding: 2px;"> 6 500 SOUTH MAIN STREET </div> <div style="border: 1px solid black; padding: 2px;"> 7 MADISON </div> <div style="border: 1px solid black; padding: 2px;"> 8 WOOD RIVER </div> <div style="border: 1px solid black; padding: 2px;"> 9 IL 62095 </div>																																					

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# VII. SIC CODES (4-digit, in order of priority)

A. FIRST				B. SECOND			
7	2	9	1	7	2	8	6
(specify) PETROLEUM REFINING				(specify) ADDITIVE MANUFACTURING			
C. THIRD				D. FOURTH			
7	NA			7	NA		
(specify)				(specify)			

## VIII. OPERATOR INFORMATION

A. NAME												B. Is the name listed Item VIII-A also the owner?		
8	AMOCO OIL COMPANY												<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	
C. STATUS OF OPERATOR (Enter the appropriate letter into the answer box; if "Other", specify.)												D. PHONE (area code & no.)		
F = FEDERAL M = PUBLIC (other than federal or state) S = STATE O = OTHER (specify) P = PRIVATE												312 856 5111		
E. STREET OR P.O. BOX														
2000 EAST RANDOLPH DRIVE														
F. CITY OR TOWN						G. STATE		H. ZIP CODE		IX. INDIAN LAND				
CHICAGO						IL		60601		Is the facility located on Indian lands? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO				

## X. EXISTING ENVIRONMENTAL PERMITS

A. NPDES (Discharges to Surface Water)				D. PSD (Air Emissions from Proposed Sources)			
9	N	IL00000035		9	P	NA	
B. UIC (Underground Injection of Fluids)				E. OTHER (specify)			
9	U	NA		9		NA (specify)	
C. RCRA (Hazardous Wastes)				E. OTHER (specify)			
9	R	NA		9		NA (specify)	

## XI. MAP

Attach to this application a topographic map of the area extending to at least one mile beyond property boundaries. The map must show the outline of the facility, the location of each of its existing and proposed intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all springs, rivers and other surface water bodies in the map area. See instructions for precise requirements.

## XII. NATURE OF BUSINESS (provide a brief description)

THE REFINING OF CRUDE PETROLEUM INTO FUEL GAS, LPG, PROPYLENE CONCENTRATE, MOTOR GASOLINES, JET FUELS, KEROSENE, DIESEL FUEL, FURNACE OIL, POLYBUTENES, RESIDUAL FUELS, INDUSTRIAL ASPHALTS, AND PAVING ASPHALTS. ALSO MANUFACTURED ARE ADDITIVES FOR LUBRICATING OILS, FUEL OILS, AND GASOLINES. THIS FACILITY CONTAINS OFFICES, STORAGE TANKS, AND WASTEWATER TREATING FACILITIES ASSOCIATED WITH THE REFINING OF PETROLEUM IN THE REFINERY PROPER.

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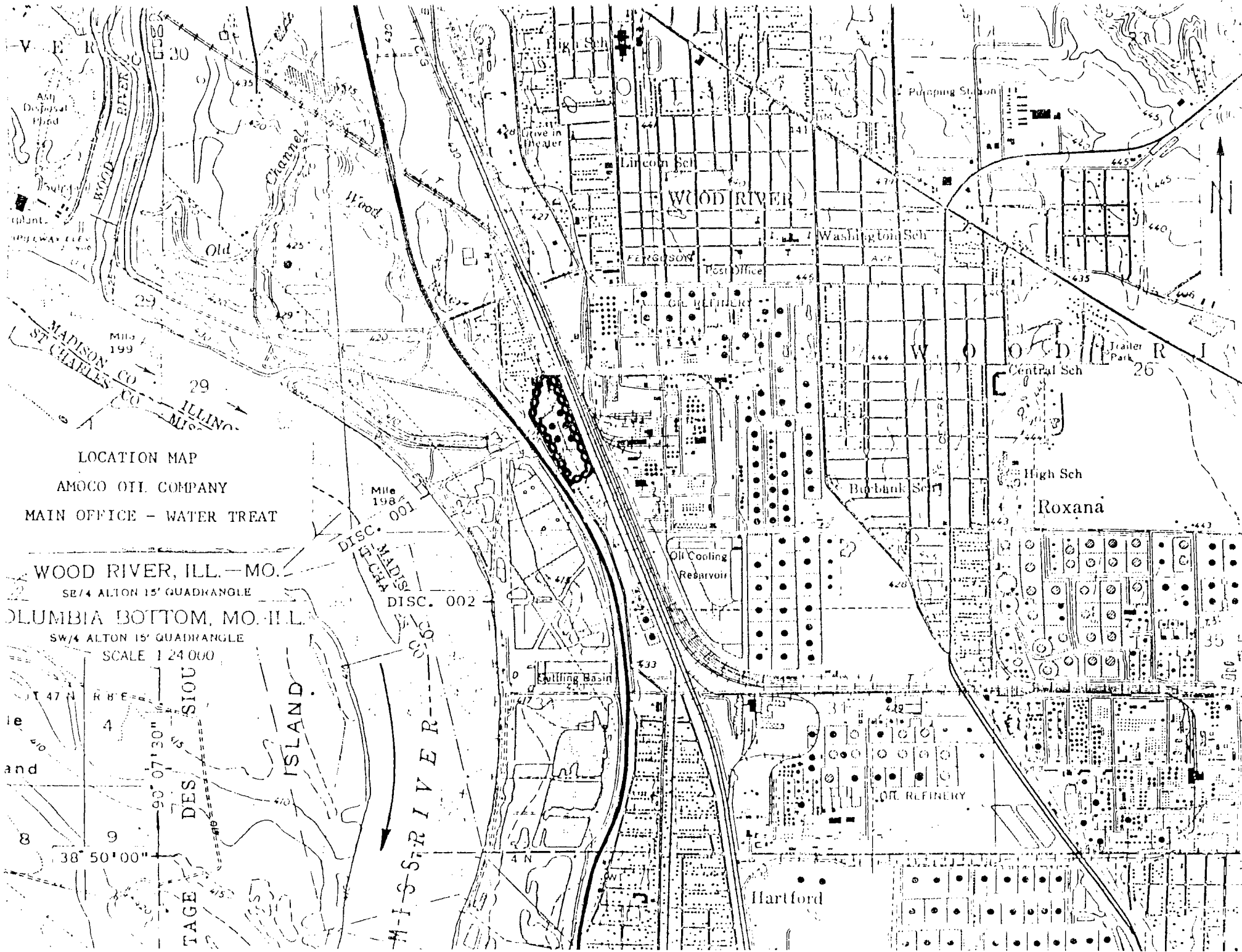
## XIII. CERTIFICATION (see instructions)

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this application and all attachments and that, based on my inquiry of those persons immediately responsible for obtaining the information contained in the application, I believe that the information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME & OFFICIAL TITLE (type or print)	B. SIGNATURE	C. DATE SIGNED
J. F. HORNER, VICE PRESIDENT REFINING AND ENGINEERING	<i>J. F. Horner</i>	11/18/80

## COMMENTS FOR OFFICIAL USE ONLY

C	D



LOCATION MAP

AMOCO OIL COMPANY

MAIN OFFICE - WATER TREAT

WOOD RIVER, ILL. - MO.

SE 1/4 ALTON 15' QUADRANGLE

COLUMBIA BOTTOM, MO. ILL.

SW 1/4 ALTON 15' QUADRANGLE

SCALE 1:24,000

DES MOINES

ISLAND

DISC. 002

DISC. 001

DISC. 002

DISC. 001

DISC. 002

DISC. 001

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LINE 3

T04 - BELT-PRESS DEWATERING OF DAF FLOAT

#### IV. DESCRIPTION OF HAZARDOUS WASTES

A. EPA HAZARDOUS WASTE NUMBER — Enter the four-digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle. If you handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four-digit number(s) from 40 CFR, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.

3. ESTIMATED ANNUAL QUANTITY — For each listed waste entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non-listed waste(s) that will be handled which possess that characteristic or contaminant.

C. UNIT OF MEASURE — For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE CODE  
POUNDS . . . . . P  
TONS . . . . . T

METRIC UNIT OF MEASURE CODE  
KILOGRAMS . . . . . K  
METRIC TONS . . . . . M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

#### D. PROCESSES

##### 1. PROCESS CODES:

For listed hazardous waste: For each listed hazardous waste entered in column A select the code(s) from the list of process codes contained in Item III to indicate how the waste will be stored, treated, and/or disposed of at the facility.

For non-listed hazardous wastes: For each characteristic or toxic contaminant entered in column A, select the code(s) from the list of process codes contained in Item III to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that possess that characteristic or toxic contaminant.

Note: Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code(s).

2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form.

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER — Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

1. Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B, C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
2. In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.
3. Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING ITEM IV (shown in line numbers X-1, X-2, X-3, and X-4 below) — A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non-listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

LINE NO.	A. EPA HAZ. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES	
				1. PROCESS CODES (enter)	2. PROCESS DESCRIPTION (if a code is not entered in D(1))
X-1	K054	900	P	T03D80	<div style="text-align: center;"> <b>RECEIVED</b>   MAR 02 1984   <b>E.P.A. — D.L.P.C.</b>  <b>STATE OF ILLINOIS</b>  included with above </div>
X-2	D002	400	P	T03D80	
X-3	D001	100	P	T03D80	
X-4	D002				

NOTE: Photocopy this page before coming here. If you have more than 26 wastes to list.

Form Approved OMB No. 158-00000-1

EPA I.D. NUMBER (enter from page 1)										FOR OFFICIAL USE ONLY									
WILD 006 2726 29 1										W DUP 2 DUP									

IV. DESCRIPTION OF HAZARDOUS WASTES (continued)

LINE NO.	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES																	
				1. PROCESS CODES (enter)								2. PROCESS DESCRIPTION (if a code is not entered in D(1))									
1	K 0 4 8	40,000	T	S	0	2	T	0	4	DEWATERING											
2	K 0 4 8	15,000	T	S	0	1															
3																					
4																					
5																					
6																					
7																					
8																					
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STATE OF ILLINOIS

# IV. DESCRIPTION OF HAZARDOUS WASTES (continued)

E. USE THIS SPACE TO LIST ADDITIONAL PROCESS CODES FROM ITEM D(1) ON PAGE 3.

EPA I.D. NO. (enter from page 1)

F 1 2 0 0 4 2 7 2 6 2 9 6

## V. FACILITY DRAWING

All existing facilities must include in the space provided on page 5 a scale drawing of the facility (see instructions for more detail).

## VI. PHOTOGRAPHS

All existing facilities must include photographs (aerial or ground-level) that clearly delineate all existing structures; existing storage, treatment and disposal areas; and sites of future storage, treatment or disposal areas (see instructions for more detail).

## VII. FACILITY GEOGRAPHIC LOCATION

LATITUDE (degrees, minutes, & seconds)

LONGITUDE (degrees, minutes, & seconds)

3 8 5 1 0 1 3

0 9 0 0 6 0 0 6

## VIII. FACILITY OWNER

☒ A. If the facility owner is also the facility operator as listed in Section VIII on Form 1, "General Information", place an "X" in the box to the left and skip to Section IX below.

B. If the facility owner is not the facility operator as listed in Section VIII on Form 1, complete the following items:

1. NAME OF FACILITY'S LEGAL OWNER

2. PHONE NO. (area code & no.)

NA

NA

3. STREET OR P.O. BOX

4. CITY OR TOWN

5. ST.

6. ZIP CODE

NA

NA

NA

NA

## IX. OWNER CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)

B. SIGNATURE

C. DATE SIGNED

J. F. HORNER, VICE PRESIDENT  
REFINING AND ENGINEERING

*[Signature]*

11/18/80

## X. OPERATOR CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)

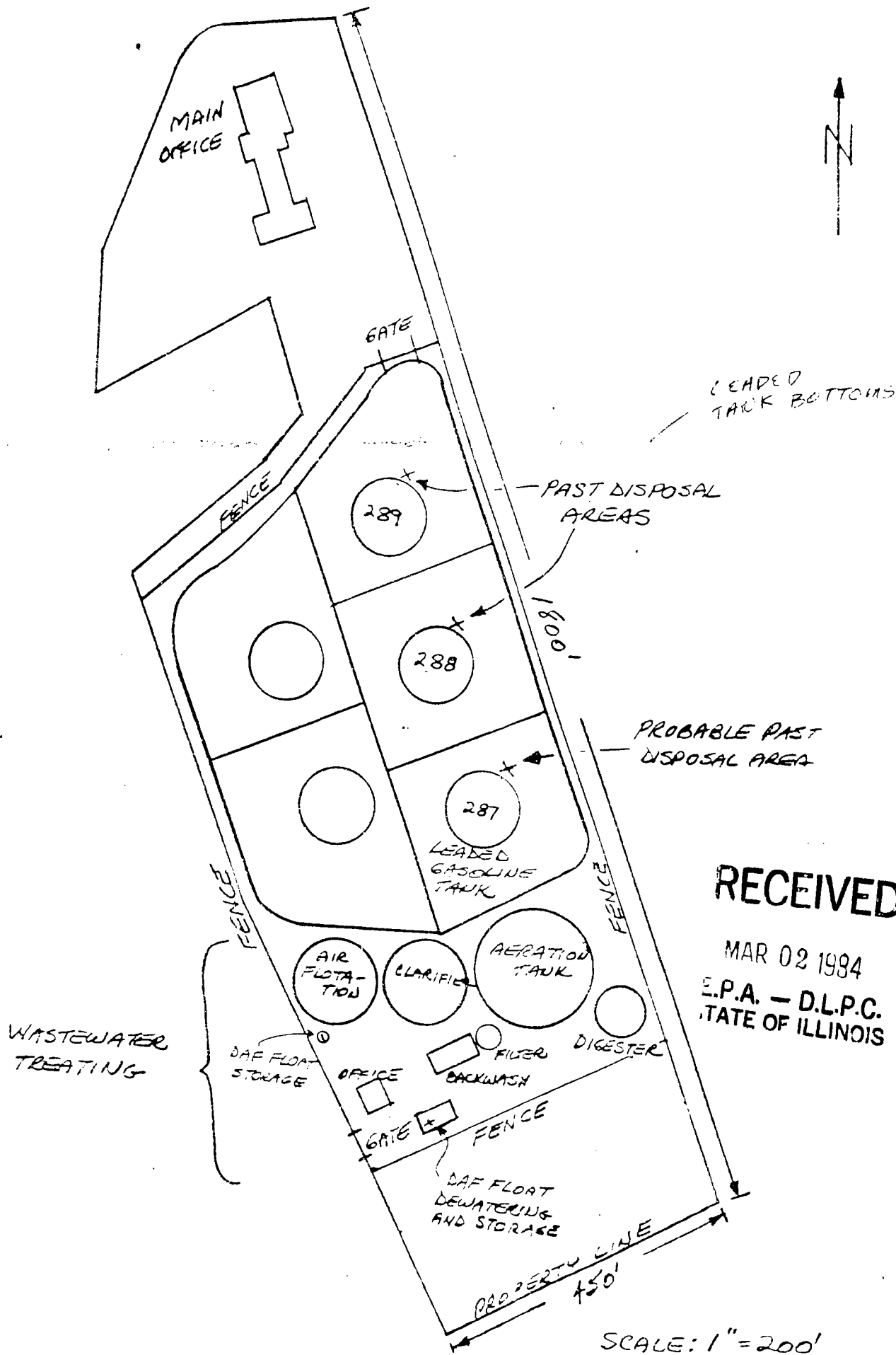
B. SIGNATURE

C. DATE SIGNED

NA

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NA



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SCALE: 1" = 200'

4-19-80

54-10



3553 PARKER SPUR  
FLORISSANT, MO 63033

PHONE  
1-314-921-4488

FILE

ENVIRONMENTAL  
ANALYSIS  
INC.

Date: Sept. 1, 1981  
Report No. 8269  
P.O. No. 802-9-20186  
Lab. No. 151-17

Mr. C. Bartels  
AMOCO OIL COMPANY  
Post Office Box 182  
400 South Main Street  
Wood River, Illinois 62095

REPORT OF ANALYSIS

Subject: Analysis performed in accordance with the Resource Conservation and Recovery Act 40 CFR; 261.23, Characteristic of Reactivity, 261.21, Characteristics of Ignitability, 261.22, Characteristics of Corrosivity and 261.24, Characteristics of EP Toxicity and Standard Methods for the Examination of Water and Wastewater, 14th Edition, 1975.

Sample Identification: Sample marked as: Pressed sludge WWTP "B" Press Dumpster Bx, dated 8-17-81.

Results of Analysis:

(I) Characteristics of Reactivity (261.23 (a) (2); (5))

Soluble Cyanide, ug CN/g	< 0.01
Total Cyanide, ug CN/g	< 1.0
Soluble Sulfide, ug S/g	0.03
Total Sulfide, ug S/g	650

(II) Characteristics of Ignitability (261.21)

Flash Point ( P-M ), F	> 210
------------------------	-------

(III) Characteristics of Corrosivity (261.22)

pH of 10% Solution	7.63
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(1)

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ANALYTICAL CHEMISTRY - RESEARCH - FIELD STUDIES

3363 PARKER SPUR  
FLORISSANT, MO 63033

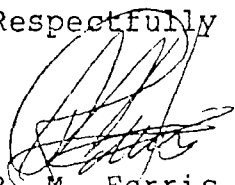
PHONE  
1-314-921-4488

ENVIRONMENTAL  
ANALYSIS  
INC.

(IV) Characteristics of EP Toxicity (261.24 (a))

Arsenic, mg As/l	0.012
Barium, mg Ba/l	12.0
Cadmium, mg Cd/l	< 0.001
Chromium, mg Cr/l	0.031
Copper, mg Cu/l	0.038
Lead, mg Pb/l	0.93
Mercury, mg Hg/l	< 0.005
Silver, mg Ag/l	0.023
Selenium, mg Se/l	< 0.001

Respectfully submitted,



R. M. Ferris,  
Director, EAI

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STATE OF ILLINOIS



## D.L.P.C. COMPLAINT INVESTIGATION FORM

C-79-69-5

MADISON CO. - 119 115-01  
HARTFORD 1 AMOCO ( )  
 Date Received 3-27-79 By K. MENSING By Phone In Person By Mail  
 Complainant NORRIS EICHLER Respondent AMOCO OIL CO  
 Address SCA SERVICES Address \_\_\_\_\_  
 Telephone \_\_\_\_\_ Telephone Ed Sullivan - 254-7351

Directions To Source WEST OF HARTFORD, NEXT TO RIVER.  
 Complaint Details AMOCO HAS SUPPLEMENTAL PERMIT AT ROXANA/SCA-HARTFORD  
BUT QUIT TAKING SLUDGE WASTE THERE ON JAN. 1, 1979.  
EICHLER SAID HE HAD HEARD THAT IT IS BEING DEPOSITED  
BETWEEN LEVEE AND RIVER AT HARTFORD

\*\*\*\*\*

## INVESTIGATION FINDINGS

Date 9/21/79 Time 1:30 pm By Ann Wietes  
 Interviewed R.S. McNamee (Hazardous Waste) Weather 70° Day - Cloudy Photos NO  
Ed Sullivan (Consult. Eng. Co.)  
 Violations Observed Special wastes from Amoco's refinery are being  
dumped between the levee and Mississippi River near their  
water treatment basins. General construction waste is also  
being dumped but should be acceptable under 21(c).  
 Respondent's Remarks The dumping area is protected by levees from  
flooding. Amoco is reluctant to submit a permit application  
until the Federal E.P.A. finalizes its rules and regs. on  
special hazardous wastes.

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## FOLLOW-UP ACTION

SEP 23 1979

Refer To \_\_\_\_\_

EPA - D.C.  
STATE

File Opened

Yes

No

Amoco has been notified of problem by letter and urged  
to arrange a meeting w/ the permit section.